

## REMARKS

This application has been reviewed in light of the Office Action dated December 22, 2006. The following claims are pending: Claims 1 to 7, 10 to 13, 15 to 17, 20 to 22, 26, 34, 39, 44, 47, 48, 59, 60 and 62. The following claims are independent: Claims 1, 34, 39, 44, 47 and 48. Reconsideration and further examination are respectfully requested.

Turning first to a formal matter involving Applicant's claim to foreign priority, it is respectfully requested that the next Communication from the Office acknowledge receipt of the claim to priority, and further acknowledge receipt of the certified copy of the priority document.

Turning to the merits of the Office Action, item 5 on page 2 thereof lists filing dates that seem unrelated to the instant application. It is assumed that these dates are typographical errors, and that the Examiner has acted on this case in accordance with the filing and priority dates of record.

Item 6 in the Office Action objected to the "status identifier" of several of the claims. The instant amendment corrects this.

All claims were rejected under 35 U.S.C. § 103(a) over U.S. Patent 6,635,088 (Hind) in view of U.S. Patent 6,883,137 (Giradot). In response, the claims have been amended, largely in accordance with the subject matter of Claim 14, which in turn has been cancelled. Accordingly, this should be viewed as a traversal of the rejection, as set out in more detail below.

The invention concerns generation of an encoded representation of a markup language document, such as an encoded representation of an XML document, in which the encoded representation includes numeric codes obtained from a hash function applied to syntactic elements therein. The document includes a first pair of start and end tags, and a second pair of start and end tags. According to one aspect of the invention, the encoded representation of the document is augmented such that corresponding hashes of the second pair of start and end tags indicate a nesting, in relation to the hashes of the first pairs of start and end tags, which is equivalent to the nesting of the second pair of tags within the first pair of tags.

By virtue of the foregoing arrangement, in which nestings of hashes of pairs of pairs of tags is equivalent to nestings of the tags themselves, beneficial effects are obtained such as the ability to check on validity and well-formedness of the encoded representation of the document. This advantageous effect is explained, for example, at page 22 of the subject application, which explains the advantages in terms of speed and memory reduction that can be achieved by using comparisons on hashed values rather than comparisons based on the original string representations of the pairs of tags.

In its rejection of now-cancelled Claim 14, the Office Action took the position that Giradot teaches the nestings of first and second pairs of tags, and the augmentation of a document using corresponding hashed tags so that the hashed tags are nested in equivalence to the nesting of the pairs of tags. See Office Action, pages 14 to 17.

Applicant respectfully disagrees with this position, based on the fundamental observation that Giradot does not generate an encoded representation of a

document. Giradot describes a method and system for compressing an XML document, in which the structural portions and the non-structural portions of the document are separated. See, Giradot, abstract, and Giradot, column 4. Giradot thus deliberately separates structure from content. Content is compressed using a ZLIB, and the structure is compressed using binary encoding. It cannot fairly be said, therefore, that Giradot pertains to the invention herein which “generates an encoded representation of a markup language document”, wherein the encoded representation includes numeric codes generated by a hash function from syntactic elements thereof.

Moreover, even if Giradot is somehow deemed to relate to the present invention, Applicant respectfully maintains that Giradot does not disclose or suggest the subject matter ascribed to it by the Office Action. The portions of Giradot relied on by the Office Action correctly observe that an XML document is formed from a nested hierarchy of elements with a single root. See Giradot, column 4, lines 28 to 29. Thus, although Giradot discloses that first and second pairs of start and end tags have a nesting relationship, Giradot does not also disclose that such a nesting relationship is reflected in the encoded representation of the document by an equivalent nesting of hashes, namely, hashes of the first and second pairs of start and end tags.

It is therefore respectfully submitted that the claims herein would not have been obvious from any permissible combination of Hind and Giradot. Such a combination would, in Applicant’s view, fail to disclose or to suggest the present invention which involves generation of an encoded representation of a markup language document, wherein the encoded representation includes a numeric code generated by a hash function from

syntactic elements in the document, and wherein the document is augmented such that corresponding hashes of first and second pairs of start and end tags indicate a nesting relation which is equivalent to the nesting of first and second pairs of start and end tags.

Allowance is respectfully requested.

Applicant's undersigned attorney may be reached in our California Office by telephone at (714) 540-8700. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael K. O'Neill", written over a horizontal line.

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